190 Manhattan Loop Los Alamos, NM 87544

December 29, 1993

Secretary, Federal Communications Commission Washington, D.C. 20554

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FCC - MAIL ROOM

re: PR Docket 93-267

Good Morning,

It has come to my attention that the Commission is considering adoption of procedures that would provide for instant licensing in the Amateur Radio Service.

As the chair of the volunteer examining team serving northern New Mexico I have worked closely with scores of new license applicants. I feel I have a good understanding of their needs and capabilities. I speak for our entire team of 15 experienced examiners when I say the applicant's primary need is to receive a license in a reasonable time, and that a large number are incapable or unwilling to exhibit the self-discipline necessary to carry out the proposed procedures. And that assumes the proposed procedures are adequate. They are not.

The proposal does not provide for any system of knowing who is using what call sign. As a ham operator for over 40 years, I know these new operators are the ones who most need help and guidance, and sometimes official tracing. The proposal is drastically flawed in that it lacks that tracing capability.

Instead, I urge your favorable consideration of a system that will allow the Commission to utilize electronic filing. Such an approach will reduce the time required to get an official license in the hands of the new amateur. And that will meet the applicants' needs as well as those of the Commission and the amateur community when it comes to tracing call signs when necessary.

Thank you for your consideration.

James S. Griffiths, KB3EI

Copies:

FCC (4)

ARRL, David Sumner

Rocky Mountain Division, Marshall Quiat

New Mexico Section, Joe Knight

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Secretary FCC Washington, D.C. 20554 RECEIVED DOCKET FILE COPY CHICINA

FCC - MAIL ROOM

December 31, 1993

In the matter of PR Docket 93-267 Re:

I wish to register my opposition to the proposed rule making in PR Docket 93-267 that would grant temporary operating privileges to applicants having earned a CSCE.

Specifically, I have serious misgivings regarding the proposed system for onair identification and the self-assignment of call signs. The proposed call sign assignment method provides no means for validation of suspicious operators by the Amateur community. I have personal knowledge that counterfeit call signs have been used and subsequently detected by vigilant Amateurs in my community. Call sign self-assignment would render such self policing impossible. A bureaucratic blunder of this type may very well lead to wholesale abuse and fraud. Additionally, this self assignment method appears to be in conflict with existing ITU regulations and agreements.

I do, however, strongly support the ARRL position on PR Docket 93-267, encouraging the swift implementation of electronic filing of application data.

Sincerely,

Carl R. Strode WA7QJY

1743 Nth Avenue Pasco, WA 99301

> No. of Copies rec'd List ABCDE



December 31, 1993

Secretary, FCC Washington, D.C. 20544

Re: In the Matter Of PR Docket 93-267

Dear Secretary,

I am a licensed ham radio operator, and wish to respectfully make comments regarding "instant licensing". as captioned above.

I recall waiting about five weeks for my license, biting my nails each day, but it finally came, and time has erased the mental anguish of the wait.

My personal opinion is that anything that "is worth having, is worth waiting for".

By the proposed change, it will no doubt lead to many abuses. The first abuse that comes to mind is about the number of individuals that take the written exam, or CW exam and fail same. I think that a great percentage of these individuals would get "right on the air", knowing that "well I'll take the exam next week and pass the test, so what the heck"....

My second thought is that the FCC was created to administer the FCC laws and regulations, and that this responsibility should not be passed on to the private sector. This leaved the door open to much abuse.

I am a retired investigator for the California Department Of Insurance, who's responsibility is similar to the FCC responsibility (radio vs. insurance). There is no way in the world that insurance agents or insurance companies could be trusted to police their own ranks.

I humbly request that you dismiss adopting PR Docket 93-267.

I thank you for the time reading this letter.

Respectfully,

Allan J. Balird KC6TWI

1802 N. Linwood Ave. Santa Ana, Ca. 92701

[714] 547-4138

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In the Matter of PR Docket 93-267,

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December 27, 1993

FCC - MAIL ROOM

Dear Sir or Madam,

I wish to go on record as being in favor of your proposal to establish a means of immediate operating privileges for successful candidates for Amateur Radio licenses. I am an Advanced class licensee, first licensed in 1965, a member of the ARRL and QCWA, and the trustee for an open UHF repeater (where I meet many newly licensed amateurs).

I disagree with the ARRL's position that your proposal for Temporary Operating Authority is fraught with abuse potential. Every system has abuse potential (somehow the ARRL seems to have forgotten that quite a few of their own VEC-qualified people were disqualified), but the ARRL's stand seems to be a matter of "cutting off one's nose to spite one's face".

Their IS a way to check on the validity of a "suspicious" (ARRL term) operator: his or her copy of the CSCE. Local people will be known locally. Their potential for abuse is minimal. Those traveling through the area won't be around long enough to be a problem, and are probably the same ones currently operating illegally. I don't see this as an increased threat. Used in conjunction with electronic filing, there will be even LESS potential for abuse of the system. A short turnaround time for the permanent license will make the "suspicious" operator suspect even sooner than currently. Knowledge of this might actually lead to LESS abuse!

The ARRL believes that a two week turnaround time is possible with electronic filing. If that figure turns out to be correct, wonderful! But it is still not enough.

It was very frustrating to watch my wife wait eight weeks for her license. During that long wait, she lost much of her excitement about amateur radio. Everyone that I have talked to about the waiting period has told me the same story: frustration and disillusionment. I suspect that many other newcomers to the hobby feel the same way. I believe that this hurts our technological potential.

Go ahead with electronic filing -that is a great idea- but please give newly qualified applicants the ability to operate immediately. This is not a matter of instant gratification, but rather a matter of instant reinforcement.

Thank you for your time.

Sincerely,

Paul M Brooks, WB6MKS 110 Big Valley Road Folsom, CA 95630-2311

Paul M Brocks

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DOCKEL ELL CODY COLGINY

THE SPACE COAST AMATEUR TECHNICAL GROUP

Duty Now for the Future of Amateur Radio 3151 S. Babcock St., #70, Melbourne, FL 32901

December 27, 1993

Office of the Secretary Federal Communications Commission Washington, D. C. 20554 JAN 3 1994

In reference to PR Docket 93-267 in the matter of Amendment of the Amateur Service Rules to Extend Temporary Operating Authority to New Amateur Radio Operators (RM-8288)

The Space Coast Amateur Technical Group supports this docket and wants to see the amateur radio operator temporary operating authority rules adopted.

SCATG could only think of two items not discussed in the proposal we have seen.

- Will there be a mechanism to notify VECs (and possibly VE Teams) of temporary operating authority cancellations? VE teams will be called upon to quickly confirm a given station's authority and if we are not notified of a cancellation, all we will be able to do is confirm a given individual did take and pass an exam on a given date. We don't expect a large number of cancellations ever to be issued so we don't think a notice of cancellations back to at least the VEC level would be an administrative burden to the Commission.
- Should there be a formal "escape valve" to permit an extension of temporary operating authority for periods when administrative delays force license-issue cycle time to exceed 120 days? Given 17 weeks plus one day should account for the worst possible case document flow and 97.5(7)(vi), 97.7(6), and 97.9(5) in the proposed change permits the Commission the discretion required. Does upgrading a license during the temporary period extend the time allotted for temporary operations?

Enclosed are 10 copies of these comments. Thank you for your attention.

Sincerely

William E. Newkirk, WB9IVR

for The Space Coast Amateur Technical Group

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Secretary
FCC
Washington, DC 20554

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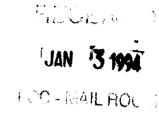
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- 3) since it will be impossible to verify the authenticity of a licensee it will create a situation where existing rules and regulations will be unenforcable.

Please do not inact proposed rule 93-267.

N5LDD Wayne Tussmijer 3309 Magnolia CX Rowlett 12 75088

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FLOYD LITTLEFIELD
2620 ME DEARMON
SACHSE TX 75048
They Comments

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Please do not inact proposed rule 93-267.

Chris Englemen KC5COF

1614 Glowbester 2.

Garlan J, Tx 75044

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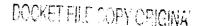
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Please do not inact proposed rule 93-267.

115 XBJ Lamin S. Spligel JAMES E. SPIEGEL 2502 CLOVER VALLEY DR. GARLAND, TX 75043

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Harold & Yoder 145M9A

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10m BLACHWELL, NSGAR

P.O. BOX 25403

DALLAS TX. 75225

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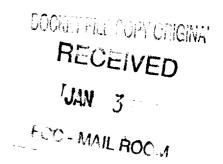
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1649 MORRISON Dr.

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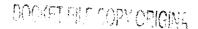
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James Morghe KBS ZDG

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Mad Owen Kc35L 5537 Jester Dr Garland, Dr. 75044

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Sherry a. Cert 23, R,OSEFIELD MESQUITE TX 75/49

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In the matter of PR Docket 93-267

JAN 3 1904

FCC - MAIL ROOM

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Richard E. Cop &B5RFO 231 Ridge Field Mesquite, Tx 75/49

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Local Com Jack

KB5 VLK Tech

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L.D. Rhoades NSDGR 617 Resewood Hill's DR GINLAND, TX 750HD

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BURT BAYES NSDED 2341 W. Apollo Rd #1831 GARLAND, TX 75044

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Emile Inherman, KGSCY 510 Redgegate Dr Garland, Tx. 75040 No. of Copie

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Granne M. Halt KB5 TTJ 2709 Reviera Dr. Darland, Je xas 75040

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